

# Morgan Lewis

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July 25, 2025

## **VIA eFILING**

Matthew L. Homsher, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor North  
Harrisburg, PA 17120

**Re: Letter of Notification of PECO Energy Company Filed Pursuant to 52 Pa. Code §§ 57.71 *et seq.* for Approval of the Siting and Construction of the 5034 Line Located in Peach Bottom Township, York County, Pennsylvania Docket No. A-2025-**

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Dear Secretary Homsher:

Enclosed for filing on behalf of PECO Energy Company (“PECO”) is a Letter of Notification Filed Pursuant to 52 Pa. Code Chapter 57, Subchapter G, for approval to rebuild and relocate a short section of the existing transmission line and related structures related to the 5034 Line, within Peach Bottom Township, York County, Pennsylvania to allow tie-in to a new 500/230 KV transmission substation. This Letter of Notification is filed pursuant to the Pennsylvania Public Utility Commission’s regulations at 52 Pa. Code § 57.72 (d)(1).

PECO respectfully requests Commission review and approval of the Letter of Notification on or before the February 19, 2026 Public Meeting to allow construction to commence in April 2026.

Copies of the Letter of Notification and accompanying attachments are being served upon the persons as required by 52 Pa. Code § 57.74 and indicated on the enclosed Certificate of Service.

**Morgan, Lewis & Bockius LLP**

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Matthew L. Homsher  
July 25, 2025  
Page 2

The \$350.00 filing fee was submitted electronically.

If you have any questions pertaining to this matter, please do not hesitate to contact me directly at 215.963.5384.

Respectfully submitted,



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KMK/nt  
Enclosure

c: Per Certificate of Service (w/encls.)

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Letter of Notification of PECO Energy :  
Company Filed Pursuant to 52 Pa. Code §§ :  
57.71 et seq. for Approval of the Siting and :           Docket No. A-2025-\_\_\_\_\_  
Construction of the 5034 Line Located in :  
Peach Bottom Township, York County, :  
Pennsylvania :  
:**

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**LETTER OF NOTIFICATION OF  
PECO ENERGY COMPANY**

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**TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:**

PECO Energy Company (“PECO” or the “Company”) hereby files this Letter of Notification, pursuant to 52 Pa. Code § 57.72(d) requesting Commission approval to rebuild and relocate a short section of the existing transmission line and related structures related to the 5034 Line<sup>1</sup> (hereinafter, the “Project”) within Peach Bottom Township, York County, Pennsylvania to allow tie-in to a new 500/230 kV transmission substation to be constructed by Transource Pennsylvania LLC (“Bramah Substation”).<sup>2</sup> The Project activities support transmission projects directed by PJM Interconnection, L.L.C. (“PJM”) (the “Reliability Projects”).<sup>3</sup>

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<sup>1</sup> PECO’s purchase of the line from Calpine Mid Merit LLC (“Calpine”) has been approved by the Federal Energy Regulatory Commission. See *Calpine Mid Merit LLC and PECO Energy Company*, 192 FERC ¶ 61,043 (2025) and a petition for Commission approval of PECO’s acquisition of associated easements from Calpine is pending before the Commission. See *Application of PECO Energy Company for a Certificate of Public Convenience under Section 1102(a)(3) and 1103 of the Public Utility Code for Acquisition of Property Rights*, Pa. PUC Docket No. A-2025-3055493 (Application filed June 2, 2025). No party has intervened or protested PECO’s application to acquire the associated easements.

<sup>2</sup> The Commission entered an order issuing a certificate of public convenience to Transource and providing other approvals requested by Transource to proceed with construction of the Bramah Substation on December 19, 2024. See *Application of Transource Pa., LLC for Approval to Offer, Render, Furnish, or Supply Electric Transmission Service to the Public in the Commonwealth of Pa.*, Docket No. A-2024-3049272, & *Affiliated Interest Agreement of Transource Pa., LLC*, Docket No. G-2024-3049271 (Order entered Dec. 19, 2024).

<sup>3</sup> The Reliability Projects include the transmission lines and related facilities associated with PECO’s proposed Brandon Shores Retirement Mitigation Project and PJM 2022 Reliability Window #3 Project. Siting applications for both projects currently pending before the Commission are unopposed and have been assigned to the Commission’s Bureau of Technical Utility Services. See *Application of PECO Energy Co. Filed Pursuant to 52 Pa. Code § 57.71*

The Reliability Projects are necessary to mitigate significant and widespread reliability issues in the Mid-Atlantic region, including PECO’s transmission facilities in southeastern Pennsylvania, that would otherwise result from (a) the planned deactivation of Talen Energy Corporation’s Brandon Shores Generating Station in Anne Arundel County, Maryland, and (b) significant load growth and the retirement of generation facilities in other parts of the PJM footprint. PECO respectfully requests Commission review and approval of the Letter of Notification on or before the February 19, 2026 Public Meeting in order to allow construction to commence in April 2026.

In support of the approval requested herein, PECO states as follows:

**I. INTRODUCTION AND OVERVIEW**

1. This Letter of Notification is filed by PECO, a “public utility” as defined in 66 Pa.C.S. § 102, that provides electric distribution, transmission, and default service in Pennsylvania subject to the regulatory jurisdiction of the Commission.

2. PECO’s address is as follows:

PECO Energy Company  
2301 Market Street  
Philadelphia, PA 19103

3. The names and addresses of PECO’s attorneys in this matter who are authorized to receive notices and communications on their clients’ behalf are:

Anthony E. Gay  
PECO Energy Company

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*et seq. for Approval of the Siting and Construction of the Brandon Shores Retirement Mitigation Project Located in Peach Bottom Twp., York Cty., Pa. and Petition for Waiver of 52 Pa. Code § 57.72(C)(10), Docket No. A-2024-3051467 (filed September 30, 2024) (“Brandon Shores Application”) & Interim Order Reassigning Application to the Commission’s Bureau of Technical Utility Services (Order entered February 13, 2025); Application of PECO Energy Co. Filed Pursuant to 52 Pa. Code § 57.71 et seq. for Approval of the Siting and Construction of the PJM 2022 Reliability Window #3 Project Located in Peach Bottom Twp., York Cty., Pa. and Petition for Waiver of 52 Pa. Code § 57.72(C)(10), Docket No. A-2024-3051463 (filed September 30, 2024) (“PJM 2022 Window #3 Application”) & Interim Order Reassigning Application to the Commission’s Bureau of Technical Utility Services (Order entered February 13, 2025).*

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4. PECO furnishes electric service to approximately 1.7 million electric customers and also serves over 553,000 natural gas customers throughout its certificated service territory, which encompasses approximately 2,100 square miles in Pennsylvania. PECO owns approximately 1,050 miles of transmission lines, approximately 13,000 miles of aerial distribution facilities, and approximately 9,000 miles of underground distribution facilities. In addition, PECO owns approximately 13,800 miles of natural gas mains and services.

5. PECO estimates the total Project cost to be \$14 million. Of that cost, \$3.2 million is attributed to materials (new conductor/hardware, optical ground wire, structures, foundations, substation equipment). The remaining costs are attributable to direct labor – primary engineering and design, clearance reviews, and electrical/civil construction – and allocated to PECO overhead and management costs. PECO will own, finance, and build the proposed Project.

6. The Project has a scheduled construction start date of April of 2026 for the Line 5034 demolition and relocation activities to meet an in-service date of December of 2027. The Project requires a transmission outage, currently scheduled for the Fall of 2027.

7. Accompanying this Letter of Notification are the following Attachments that provide additional detailed information regarding the Project:

- Attachment 1 – Plan & Profile Drawings
- Attachment 2 – Overview Map
- Attachment 3 – Letter of Notification Filing Checklist

8. This Letter of Notification, including the accompanying Attachments, which are incorporated herein by reference, contains all of the information required by 52 Pa. Code § 57.72(d)(4).

## **II. THE PROJECT**

### **A. Need for the Project**

9. The Project is a critical step in enabling the Reliability Projects. As described in the Brandon Shores Application and PJM 2022 Reliability Window #3 Application pending before the Commission for the Reliability Projects, PECO is designated by PJM to construct several new transmission lines to mitigate significant and widespread reliability issues in the Mid-Atlantic region and to foster needed generation additions and retirements as well as load growth on the PJM system, as approved by PJM.<sup>4</sup>

10. As part of the Brandon Shores Application, PECO proposes to construct a new 5042 Line and 220-93 Line that will each tie-in to the northwest of the new Bramah Substation. Without the proposed Project, these new lines would have to cross the existing 5034 Line. As part of the Project, a short segment of the existing 5034 Line will be moved south out of the intended pathway of the new Brandon Shores Application's transmission lines. The Project will also allow for the Brandon Shores Application's new 5012 Line to tie-in to the south of the new Bramah Substation

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<sup>4</sup> See Brandon Shores Application, pp. 9-16; PJM 2022 Window #3 Application, pp. 9-16.

without crossing the existing 5034 Line to the east of the Bramah Substation. Similarly, the Project will allow the new 5047 Line and 5041 Line constructed as part of the PJM Reliability Window #3 Application to tie-in to the Bramah Substation, in the northwest and south of the substation, respectively, without crossing the existing 5034 Line.

11. PECO and Calpine have negotiated an asset purchase agreement for the existing 5034 Line. As part of that purchase, PECO intends to acquire certain easements from Calpine on which the existing 5034 Line is sited, and those easements will be used for the Project. PECO has filed a separate application with the Commission at Docket No. A-2025-3055493 for approval to acquire these easements from Calpine.

**B. Description of the Proposed Project**

12. The Project involves demolishing approximately 0.86 miles of the existing 5034 Line, constructing approximately 0.87 miles of new 500 kV lines, and reusing approximately 2.58 miles of the existing 5034 Line. PECO proposes cutting the existing 5034 Line into two segments that will each connect to Bramah Substation. The section between the York Substation and Bramah Substation will retain the 5034 Line designation. The section between Bramah Substation and Peach Bottom South Substation will be temporarily renamed the 5074 Line, which will be connected to the 5014 Line and renamed the 5014 Line. The Project will traverse the properties of four landowners, including Calpine, and PECO proposes to construct new transmission structures on property owned by Troyer Farms LLC, Grimmell Farms LP, and Transource Pennsylvania LLC that did not previously have structures. PECO will negotiate to obtain necessary rights-of-way and easements with these impacted landowners.

13. The tap of the 5034 Line (York to Bramah) to Bramah Substation will begin between existing structures 15 and 16 and consist of demolishing three existing galvanized tubular monopole structures and constructing four new single circuit weathering steel tubular monopoles

for approximately 0.37 miles within a new 140-foot right-of-way. The section between York Substation and Bramah Substation will retain the 5034 Line designation and reuse 1.21 miles of the existing 5034 circuit. The 5034 tap to the Bramah Substation will be located south of the existing 5034 Line in order to make room for two new 500 kV lines from Bramah Substation to the Pennsylvania/Maryland state line and one 230 kV line from the Bramah Substation to Cooper Substation, as further described in the Brandon Shores Application and PJM 2022 Reliability Window #3 Application.

14. The tap of the 5074 Line (Bramah to Peach Bottom South) to Bramah Substation will begin between existing structures 9 and 10 and consist of demolishing two galvanized tubular monopole structures and constructing one new single circuit weathering steel tubular three-pole structure and two new single circuit weathering steel tubular monopoles for approximately 0.5 miles within a new 180-foot right-of-way. The new 5074 Line will also reuse 1.37 miles of the existing 5034 circuit. The new 5074 Line segment will provide room for two new 500 kV lines from Peach Bottom South Substation to Bramah Substation, as further described in the Brandon Shores Application and PJM 2022 Reliability Window #3 Application

15. The new segments will utilize double-bundled 1590 kcmil 54/19 “Falcon” ACSR conductor,<sup>5</sup> and the point of interconnection for both the 5034 Line and 5074 (future 5014) Line will be the first structure outside of the Bramah Substation.

16. There is currently no pending litigation regarding the right-of-way or environmental matters related to the Project.

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<sup>5</sup> Consistent with the statement issued on March 27, 2025, in Docket No. A-2024-3052612, PECO has considered alternative engineering solutions and advanced transmission technologies for the Project. PECO will use ACSR conductors to match the conductors of the existing 5034 Line that PECO will cut into for this Project. In general, the capacity of a transmission line is limited by the lowest-rated conductor on the circuit; therefore, installing advanced conductors on only a portion of a transmission circuit (as here) would not increase the operational capability or reliability of the existing 5034 Line. However, PECO notes that in the event the line is reconducted in the future, the new transmission structures proposed in this LON will be compatible with advanced conductors.

### **III. HEALTH AND SAFETY**

17. The proposed Project will not create any unreasonable risk of danger to public health or safety. The proposed Project will be designed, constructed, operated, and maintained in a manner that meets or surpasses all applicable National Electrical Safety Code (“NESC”) minimum standards and all applicable legal requirements. The design, construction, and operation of the Project will meet or exceed the requirements specified in the latest revisions of the NESC and all applicable safety standards established by the Occupational Safety and Health Administration (“OSHA”). All work shall be done in accordance with NESC, OSHA and any applicable local, state, or federal requirements.

18. PECO will construct the Project with ground clearances that meet the requirements of the project design criteria document, which meet or exceed the NESC 2023 requirements. With respect to vertical clearances, PECO designs these facilities to meet the NESC rules, plus 4.6 additional feet of vertical clearance. Similarly, PECO adds an additional 4.6 feet of horizontal clearance beyond the NESC horizontal clearance rules.

### **IV. DESCRIPTION OF THE PROJECT AREA**

19. The Project will be located within Peach Bottom Township, York County, Pennsylvania. Most of the Project activities will occur on PECO property, including easements that PECO has agreed to purchase from Calpine subject to Commission approval. PECO intends to acquire any additional necessary land rights for approximately 0.87 miles of right-of-way or easements from three additional landowners, including Troyer Farms LLC, Grimmel Farms LP, and Transource Pennsylvania LLC. *See* Attachment 1 for a map of the proposed Project and Attachment 2 for an overview map with the new segments and existing structures. PECO will negotiate to obtain necessary rights-of-way and easements with these impacted landowners. PECO anticipates that the Project will have minimal incremental impact on land use in the Project area.

The Grimmel Farms LP property has an agricultural conservation easement. PECO has coordinated with the Pennsylvania Department of Agriculture, Bureau of Farmland Preservation, with respect to the agricultural conservation easement over the Grimmel Farms LP property, and PECO was advised that the granting of a right-of-way for electric lines is permitted on preserved farms per Section 914.1c (6)(ii) of the Agricultural Area Security Law.

20. Vegetative cover in the Project area is predominantly agricultural, with one of the two Project segments passing over forested stream valley. Tree clearing will be required in forested areas to establish the right-of-way in the new easement areas. Once established, the right-of-way will be managed under PECO's existing vegetation management programs to establish and maintain compatible low-growing plant communities.

21. The closest airport to the Project area is the Lancaster Airport, which is located approximately 30 miles from the location of the new Bramah Substation. PECO does not anticipate any interference with airport operations. PECO will file any required documentation with the Federal Aviation Administration and the Pennsylvania Department of Transportation, Bureau of Aviation. PECO will comply with any additional lighting and other visual aids that may be required by these agencies for new construction to ensure aviation safety in the region.

22. The Project will not traverse or affect any unique geological or scenic areas.

23. The Project will not affect any state lands, national parks, state parks, local parks, recreational areas, or natural landmarks. The closest local park and recreational area is the Peach Bottom Township Recreation Area, located north of Lay Road, west of the intersection with Flintville Road, which is not expected to be impacted by the Project.

24. Two streams and one wetland will be crossed by the Project. Vegetation will be removed in the new transmission line crossings of these streams and wetlands to maintain

transmission line required clearances. Erosion and sediment control devices and best management practices will be in place to minimize the potential for erosion and sedimentation to these features. A Pennsylvania Natural Diversity Inventory (“PNDI”) was required and identified potentially threatened or endangered species in the vicinity of the Project. Based on a search of the PNDI database (PNDI-810587, 3/25/2024 and last revised on 3/6/2025), administered by the Pennsylvania Natural Heritage Program, and follow-up consultations with the United States Fish and Wildlife Services (“USFWS”), Pennsylvania Game Commission (“PAGC”), Pennsylvania Fish and Boat Commission (“PAFBC”), and Pennsylvania Department of Conservation and Natural Resources (“PADCNR”), the following federal and/or state rare, threatened, or endangered species are known within the vicinity of the Project:

- *Haliaeetus leucocephalus* (Bald Eagle): Two Bald Eagle nests are located within the Project limits. Both of the nests will need to be removed to facilitate the construction of the necessary infrastructure in and around these locations. One of the nests is located in the immediate area of the Calpine transmission line. PECO will be applying to the USFWS for a “Nest Take” permit in the Fall of 2025 in order to remove both nests from the project site. It is anticipated that the nest removals will be undertaken and completed prior to the December 15, 2025 start of the Bald Eagle breeding and nesting season. Apart from requirements associated with a Nest Take permit, PECO anticipates no additional requirements from the USFWS related to the Bald Eagle nest removal activities.
- *Plestiodon laticeps* (Broad-headed Skink): PAFBC reviewed habitat assessment surveys completed by PECO’s subconsultants, AECOM Technical Services, Inc. and DuBois and Associates, LLC (collectively, “AECOM/DuBois”) for potential

impacts to the Broad-headed Skink in the Project area. Per a PAFBC letter issued on February 27, 2025, PECO has proactively reduced the disturbance areas to the minimum area practicable for the execution of the Project, and no further habitat protection measures are required.

AECOM/DuBois also completed presence/absence surveys for PADCNr for listed threatened and endangered plant species identified through correspondence with PADCNr in 2024 and issued a report of survey findings to PADCNr in January 2025. PADCNr determined that there are no threatened and endangered species in the Project area through their letter issued on January 30, 2025. PAGC reviewed the Project area as part of the PNDI initiation and issued a response of “No Known Impact” and no further consultation was required.

25. The Project is not expected to have any impacts on communications towers, pipelines, or other utilities.

26. No 100-year floodplains are located within the Project area.

## **V. NOTICE**

27. Copies of this Letter of Notification will be served on the governmental agencies, municipalities, and other public entities in accordance with 52 Pa. Code § 57.72(d)(3).

28. PECO will provide such additional forms of notice as may be directed by the Commission.

## **VI. LETTER OF NOTIFICATION**

29. PECO is proceeding by means of a Letter of Notification, instead of a full Application, pursuant to the Commission’s regulations at 52 Pa. Code §§ 57.72(d)(1)(vi).

30. The proposed Project qualifies for use of a Letter of Notification because the newly constructed high voltage transmission lines will be less than two miles.

31. This Letter of Notification is filed on the date set forth below. As provided in 52 Pa. Code § 57.72(d)(5), the Commission will review and, by order, approve or disapprove this Letter of Notification. If the Commission approves this Letter of Notification the proposed Project will be constructed as proposed herein without the formal application process set forth at 52 Pa. Code §§ 57.71 et seq.

## **VII. CONCLUSION**

WHEREFORE, PECO respectfully requests the Commission grant approval to construct two transmission lines and related structures related to the Project within Peach Bottom Township, York County, Pennsylvania to allow tie-in to the Bramah Substation and to support the Reliability Projects.

Respectfully submitted,



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Dated: July 25, 2025

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Letter of Notification of PECO Energy :  
Company Filed Pursuant to 52 Pa. Code §§ :  
57.71 *et seq.* for Approval of the Siting and :     Docket No. A-2025-  
Construction of the 5034 Line Located in :  
Peach Bottom Township, York County, :  
Pennsylvania :**

**VERIFICATION**

I, Drew T. Davis, hereby declare that I am the Vice President, Transmission and Substation for PECO Energy Company; that, as such, I am authorized to make this verification on its behalf; that the facts set forth in the foregoing Letter of Notification are true and correct to the best of my knowledge, information, and belief; and that I make this verification subject to the penalties of 18 Pa. C.S.A. § 4904 pertaining to false statements to authorities.

DATE: July 25, 2025



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Drew T. Davis  
Vice President, Transmission and Substations

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Letter of Notification of PECO Energy :  
Company Filed Pursuant to 52 Pa. Code :  
§§ 57.71 *et seq.* for Approval of the Siting :                   Docket No. A-2025-\_\_\_\_\_  
and Construction of the 5034 Line :  
Located in Peach Bottom Township, :  
York County, Pennsylvania :**

**CERTIFICATE OF SERVICE**

I hereby certify that on this date, the parties listed below that are entitled to receive a copy of the above-captioned Letter of Notification pursuant to 52 Pa. Code § 57.74 were served by certified mail, return receipt requested, a copy of the above-captioned Letter of Notification.

Darryl A. Lawrence  
Office of Consumer Advocate  
555 Walnut Street  
Forum Place – 5th Floor  
Harrisburg, PA 17101-1921

Allison C. Kaster  
Bureau of Investigation and Enforcement  
PA Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor West  
Harrisburg, PA 17120

NazAarah Sabree  
Office of Small Business Advocate  
555 Walnut Street  
Forum Place – 1st Floor  
Harrisburg, PA 17101

York County Commissioners  
28 East Market Street – 2nd Floor  
York, PA 17401  
Attn: Julie Wheeler, President Commissioner

York County Planning Commission  
York County Administrative Center  
28 E Market Street, 3rd Floor  
York, PA 17401  
Attn: Wade Gobrecht, Director

Jonelle Harter Eshbach, Esq.  
York County Solicitor  
Administrative Center  
28 East Market Street  
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Craig S. Sharnetzka, Esq.  
Peach Bottom Township Solicitor  
CGA Law Firm  
135 North George Street  
York, PA 17401

Peach Bottom Township  
6880 Delta Road, Suite 3  
Delta, PA 17314  
Attn: David E. Gemmill, Chairperson

PA Department of Environmental  
Protection  
Market Street State Office Building  
P.O. Box 2063  
Harrisburg, PA 17105-2063  
Attn: Office of Field Operations

The Department of Environmental Resources  
101 S. Second Street  
  
Post Office Box 2357  
Harrisburg, Pennsylvania 17120  
Attn: Bureau of Environmental Planning

PA Department of Transportation  
Commonwealth Keystone Building  
400 North Street, 5th Floor  
Harrisburg, PA 17120  
Attn: Jeffery Spotts, Chief Counsel

PA Historical & Museum Commission  
Bureau for Historic Preservation  
Commonwealth Keystone Building, 2nd Fl.  
400 North Street  
Harrisburg, PA 17120-0053  
Attn: Andrea MacDonald, Bureau Director

York County Conservation District  
2401 Pleasant Valley Road  
Suite #101 RM #139,  
York, PA 17402  
Attn: Eric Jordan, Program Manager

U.S. Fish and Wildlife Service  
Pennsylvania Field Office  
110 Radnor Rd, Suite 101  
State College, PA 16801-4850  
Attn: Lesa Lindsay, Administrative Officer

Federal Aviation Administration  
Eastern Obstruction Evaluation  
10101 Hillwood Parkway  
Fort Worth, TX 76177

PA Department of Conservation & Natural Resources  
Rachel Carson State Office Building  
400 Market St.  
Harrisburg, PA 17105-8767  
Attn: Rebecca Bowen, Conservation Science and  
Ecological Services Division Chief

PA Fish and Boat Commission  
Natural Diversity Section  
450 Robinson Lane  
Bellefonte, PA 16823-9620  
Attn: Christopher A. Urban, Chief

PA Game Commission  
2001 Elmerton Avenue  
Harrisburg, PA 17110-9797  
Attn: Dr. Matthew Schnupp, Director

U.S. Army Corps of Engineers  
Baltimore District Corporate  
Communication Office  
2 Hopkins Plaza  
Baltimore, Maryland 21201  
Attn: Planning Division

PA Department of Agriculture  
2301 N. Cameron St.  
Harrisburg, PA 17110  
Attn: Stephanie Zimmerman,  
Bureau of Farmland Preservation Director

John F. Povilaitis  
Alan M. Seltzer  
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*Counsel for Transource Pennsylvania, LLC*

Hector Garcia Santana  
American Electric Power Service Corporation  
1 Riverside Plaza, 29th Floor  
Columbus, OH 43215  
*Counsel for Transource Pennsylvania, LLC*

Grimmel Farms LP  
3855 Federal Hill Rd  
Jarrettsville, MD 21084

Troyer Farms LLC  
17905 Troyer Rd  
White Hall, MD 21161-9456

Calpine Corporation  
401 West A Street  
Suite 500  
San Diego, CA 92101  
Attn: Andrew Novotny, President

Dated: July 25, 2025



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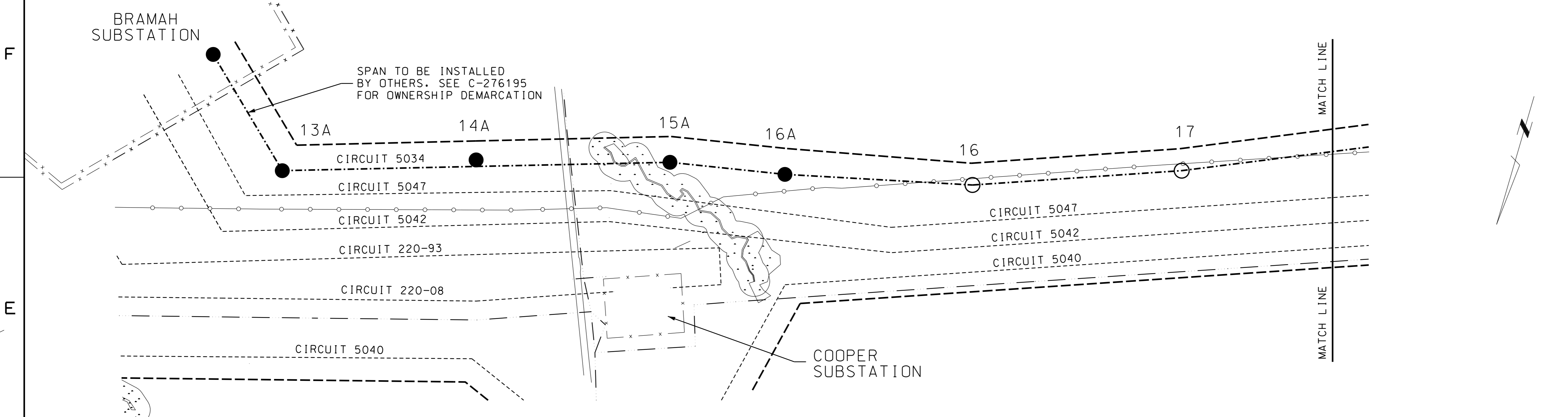
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# **ATTACHMENT 1**

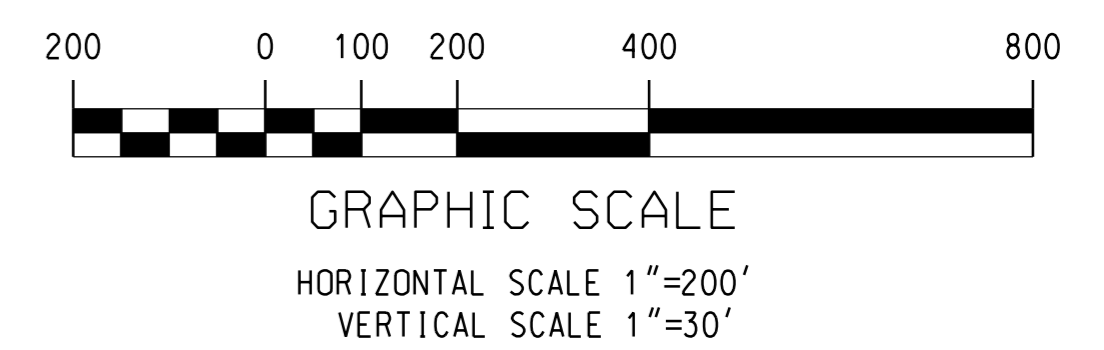
C-275876

ROUTE ATLINEYO

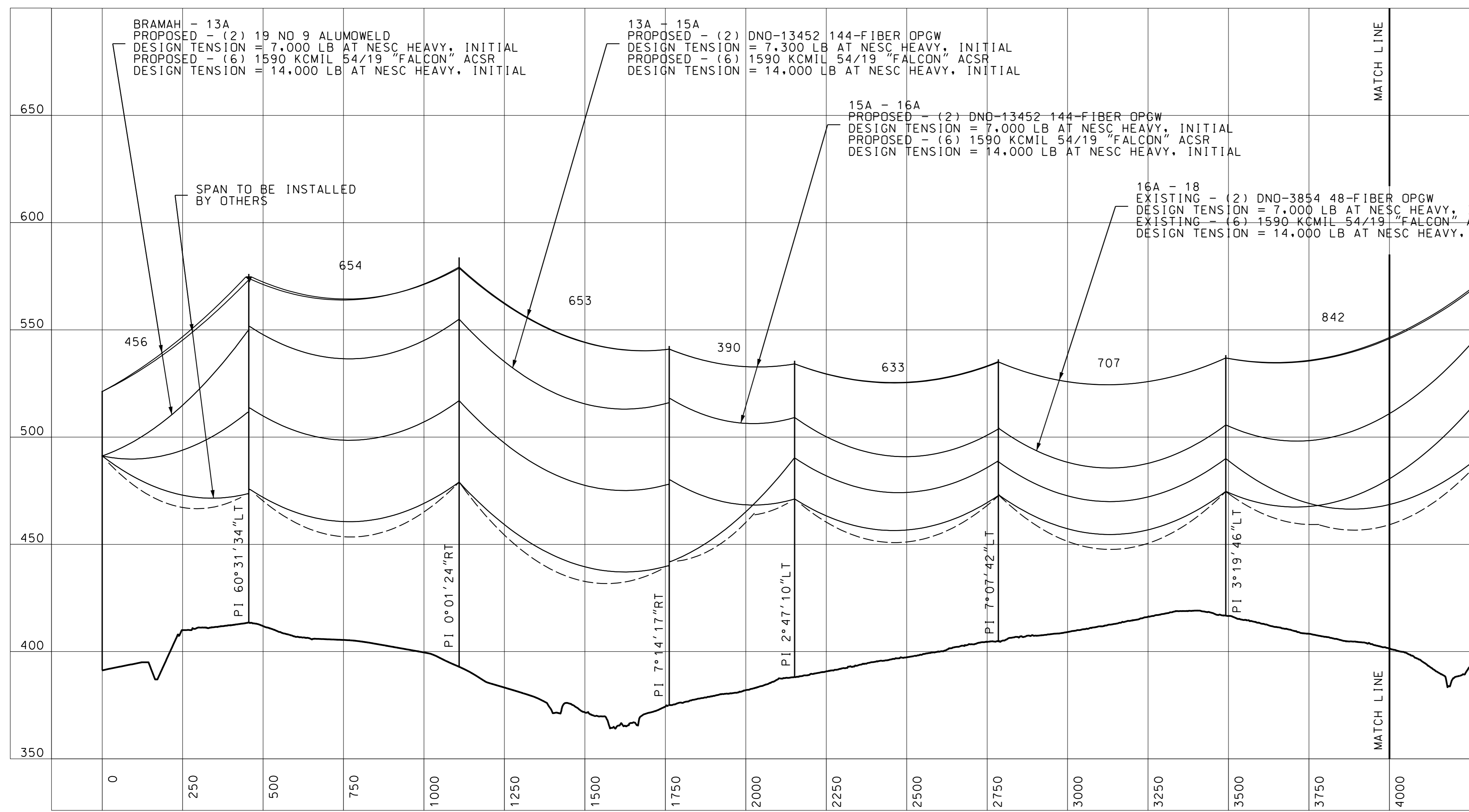


**LEGEND**

- PROPOSED TRANSMISSION  $\phi$
- - - EXISTING ADSS
- - - OTHER PROPOSED TRANSMISSION LINES
- - - ROW LINE
- x x x x x FENCE
- - - DISTRIBUTION CROSSING
- - - ROAD/PAVEMENT
- - - BOUNDARY LINE
- - - UG WATER
- - - UG GAS
- - - UG ELECTRIC
- - - WETLAND
- - - STREAM/CREEK
- PROPOSED STRUCTURE
- EXISTING STRUCTURE TO REMAIN



BRAMAH STA=00+00 PROPOSED SUBSTATION 130 FT	13A STA=4+55.58 PROPOSED VERTICAL DE 160 FT DRILLED PIER	14A STA=11+09.27 PROPOSED VERTICAL TAN 190 FT DRILLED PIER	15A STA=17+62.14 PROPOSED VERTICAL DE 165 FT DRILLED PIER	16A STA=21+51.78 PROPOSED DELTA DE 145 FT DRILLED PIER	16 STA=27+84.76 EXISTING DELTA TAN 130.5 FT	17 STA=34+91.48 EXISTING DELTA TAN 120.5 FT
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- REFERENCE DRAWINGS:**
- STRUCTURE AND ASSEMBLY INDEX  
C-276186
  - DRAWING INDEX  
C-275884 SH 5
  - PHASING  
C-275877
  - OPGW SPLICE MAP  
C-275879
  - DAMPERS  
C-275880
  - SPACERS  
C-276003

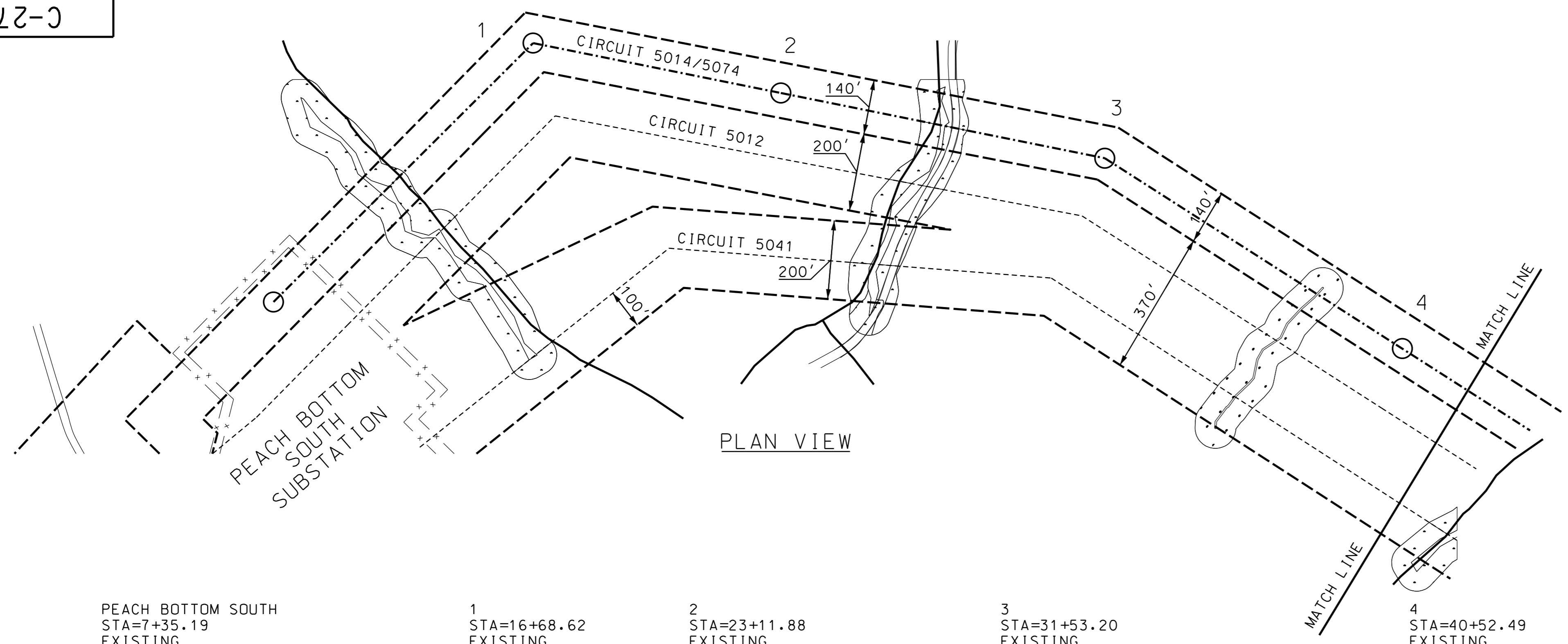
- NOTES:**
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  - CONDUCTORS ARE DISPLAYED AT 60°F, MAX SAG, UNLESS OTHERWISE NOTED. DASHED LINE IS DISPLAYED AT 257°F (MOT), MAX SAG, UNLESS OTHERWISE NOTED.
  - SHIELD WIRES ARE DISPLAYED AT 60°F, MAX SAG, UNLESS OTHERWISE NOTED.

TABLE OF ADDITIONS & CHANGES USE ONLY PRINTS SHOWING LATEST DATE		REV'D		CHK'D		APP'D	
NO.	DATE	DESCRIPTION	REV'D	CHK'D	APP'D	DATE	
A106	06-20-25	EC-xxxxxx WO-xxxxxxx POWER ENGINEERS, INC. ADDED: THIS DRAWING ISSUED FOR REVIEW					

TRANSMISSION		INDEX C-275884	
PLAN AND PROFILE CIRCUIT 5034 500KV TRANSMISSION LINE			
BRANDON SHORES RETIREMENT MITIGATION PECO Energy Company			
SCALE	DESIGN	CADD	CHECKED
NONE	PET	PET	PET
APPROVED	APPROVED	APPROVED	APPROVED
APPROVED	APPROVED	APPROVED	APPROVED
APPROVED	APPROVED	APPROVED	APPROVED
SHEET 1 OF 2		C-275876-A1	





**LEGEND**

- PROPOSED TRANSMISSION  $\odot$
- OTHER PROPOSED TRANSMISSION LINES
- ROW LINE
- x-x-x-x-x- FENCE
- - - - - DISTRIBUTION CROSSING
- ROAD/PAVEMENT
- BOUNDARY LINE
- UG WATER
- UG GAS
- UG ELECTRIC
- WETLAND
- STREAM/CREEK
- PROPOSED STRUCTURE
- EXISTING STRUCTURE TO REMAIN

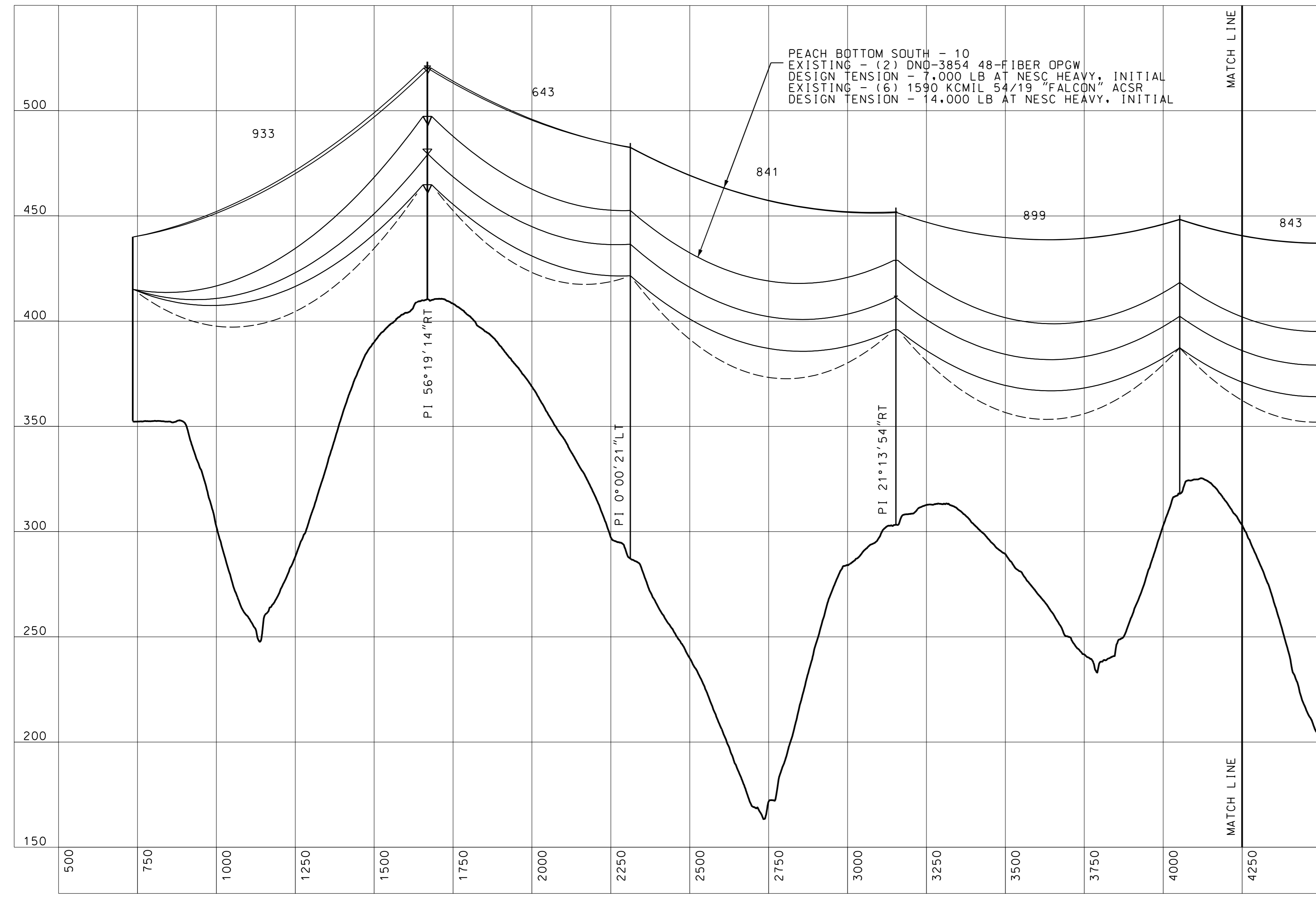
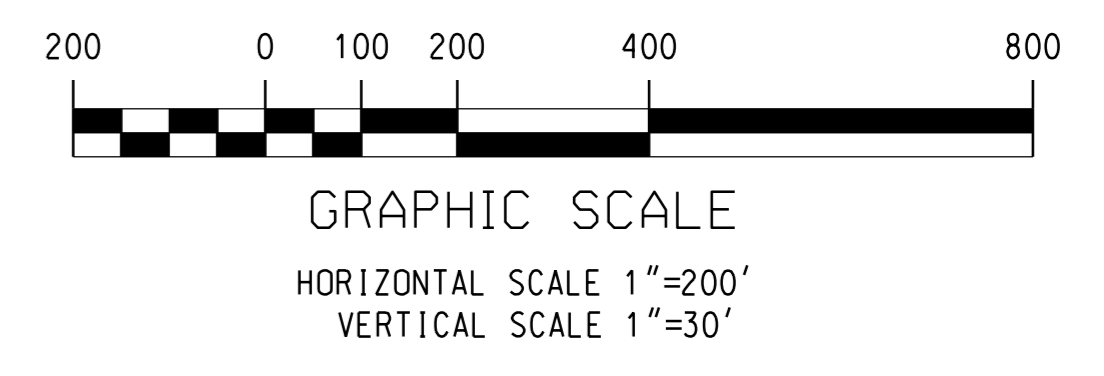
PEACH BOTTOM SOUTH STA=7+35.19 EXISTING SUBSTATION 85 FT

1 STA=16+68.62 EXISTING 500S1DEM2 110.75 FT

2 STA=23+11.88 EXISTING 500S1TN2 195.5 FT

3 STA=31+53.20 EXISTING 500S1DEM2 150.75 FT

4 STA=40+52.49 EXISTING 500S1TN2 130.5 FT

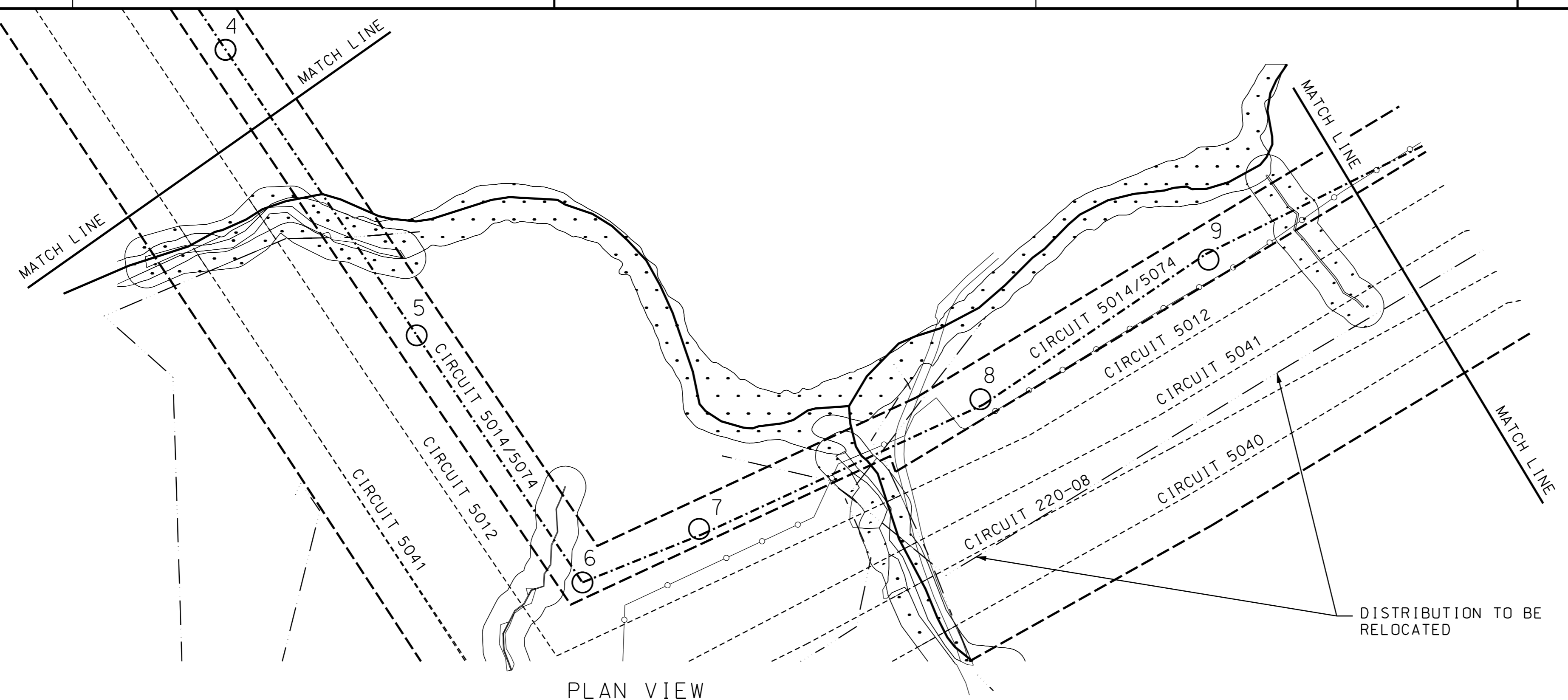


PEACH BOTTOM SOUTH - 10  
 EXISTING - (2) DNO-3854 48-FIBER OPGW  
 DESIGN TENSION - 7,000 LB AT NESC HEAVY, INITIAL  
 EXISTING - (6) 1590 KCMIL 54/19 "FALCON" ACSR  
 DESIGN TENSION - 14,000 LB AT NESC HEAVY, INITIAL

- REFERENCE DRAWINGS:**
1. STRUCTURE AND ASSEMBLY INDEX C-276192
  2. DRAWING INDEX C-275884 SH. 11
  3. PHASING C-275952
  4. OPGW SPLICE MAP C-275878
  5. DAMPERS C-275954
  6. SPACERS C-275955
  7. BIRD FLIGHT DIVERTERS C-275881

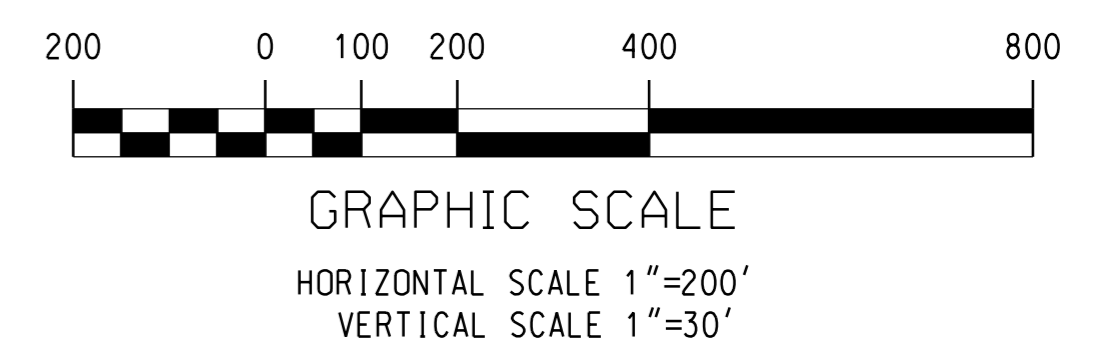
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NO.	DATE	DESCRIPTION	REV'D	CHK'D	APP'D	SCALE	DESIGN
A106	06-20-25	EC-xxxxxx WO-xxxxxxx POWER ENGINEERS, INC. ADDED: THIS DRAWING ISSUED FOR REVIEW				NONE	PEI
		APPROVED _____		APPROVED _____		APPROVED _____	
		APPROVED _____		APPROVED _____		APPROVED _____	
		APPROVED _____		APPROVED _____		APPROVED _____	
SHEET 1 OF 3		C-275883-A1		PLOT SCALE		FILE SCALE	

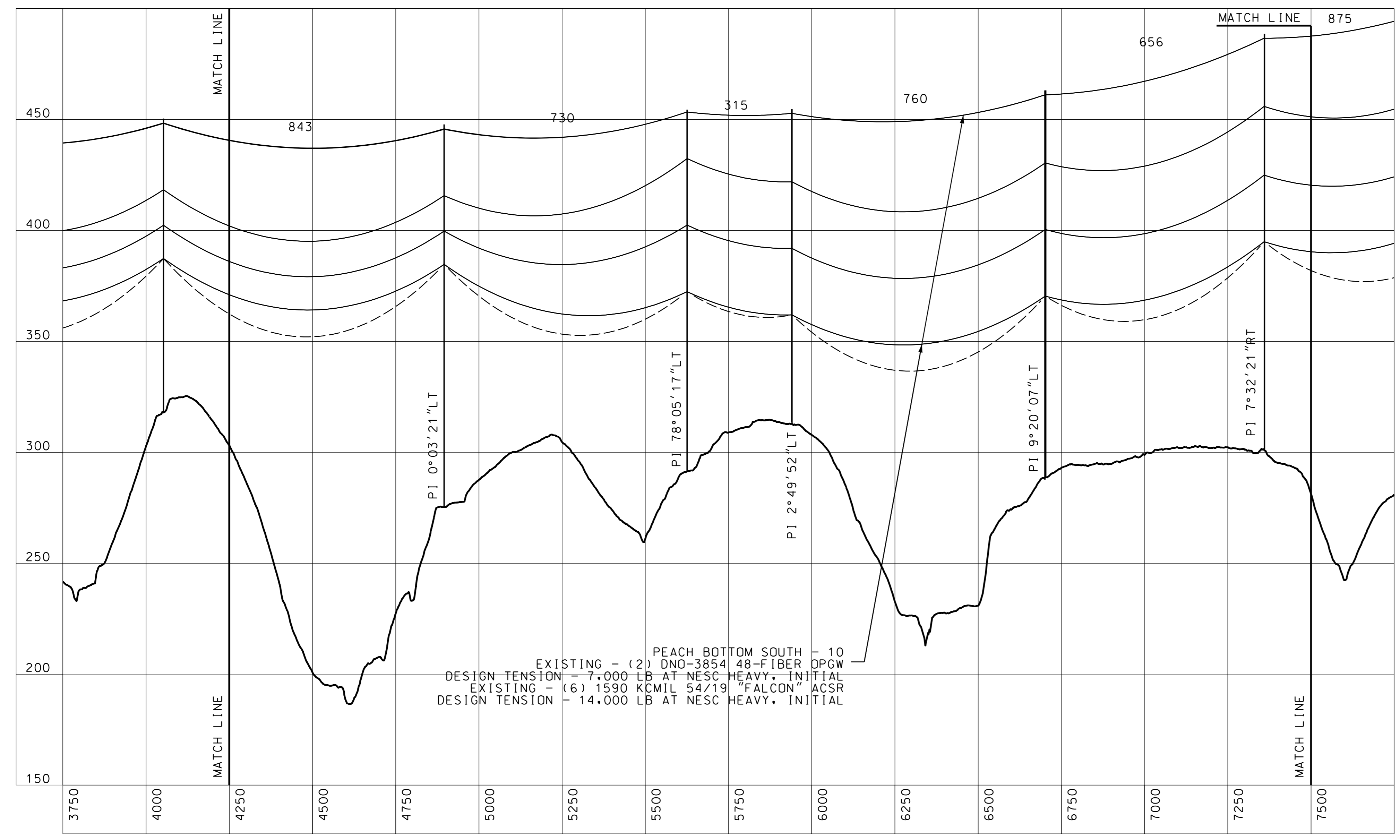


**LEGEND**

- PROPOSED TRANSMISSION Ⓞ
- OTHER PROPOSED TRANSMISSION LINES
- ROW LINE
- x-x-x-x-x- FENCE
- - - - - DISTRIBUTION CROSSING
- ROAD/PAVEMENT
- BOUNDARY LINE
- UG WATER
- UG GAS
- UG ELECTRIC
- WETLAND
- STREAM/CREEK
- PROPOSED STRUCTURE
- EXISTING STRUCTURE TO REMAIN



4 STA=40+52.49 EXISTING 500S1TN2 130.5 FT	5 STA=48+95.57 EXISTING 500S1TN2 170.5 FT	6 STA=56+25.51 EXISTING 500VS1DEV2 161 FT	7 STA=59+40.08 EXISTING 500S1TNV2 141 FT	8 STA=67+02.95 EXISTING 500S1ASTNV2 175.5 FT	9 STA=73+58.23 EXISTING 500S1ASTNV2 180.5 FT
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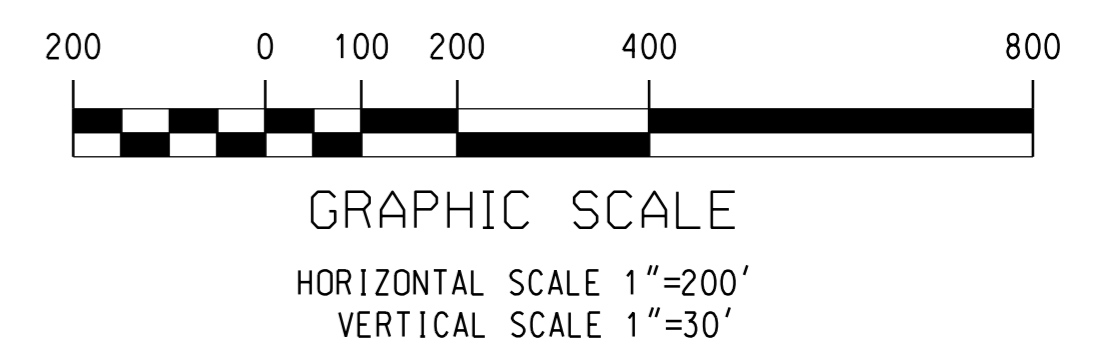
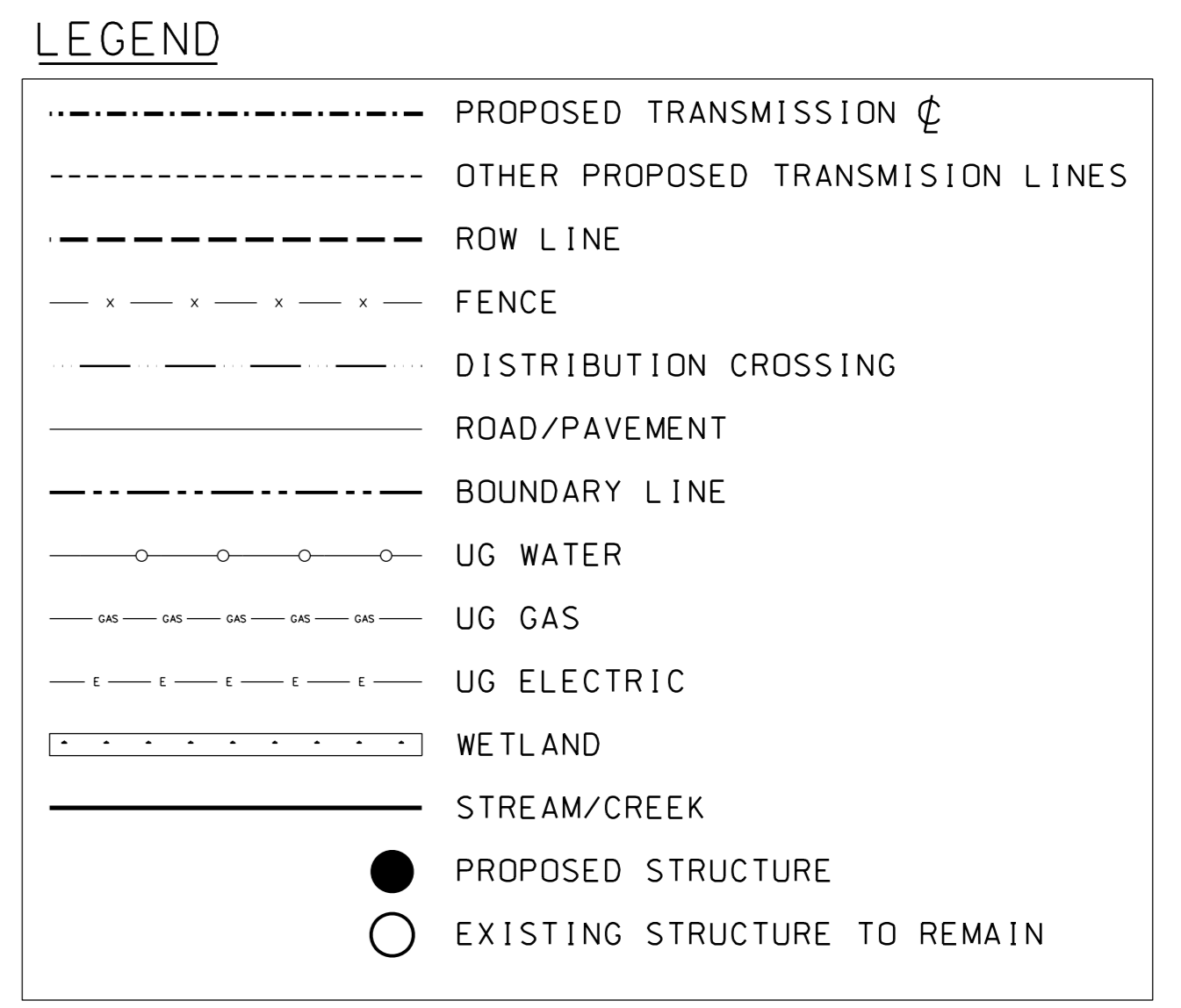
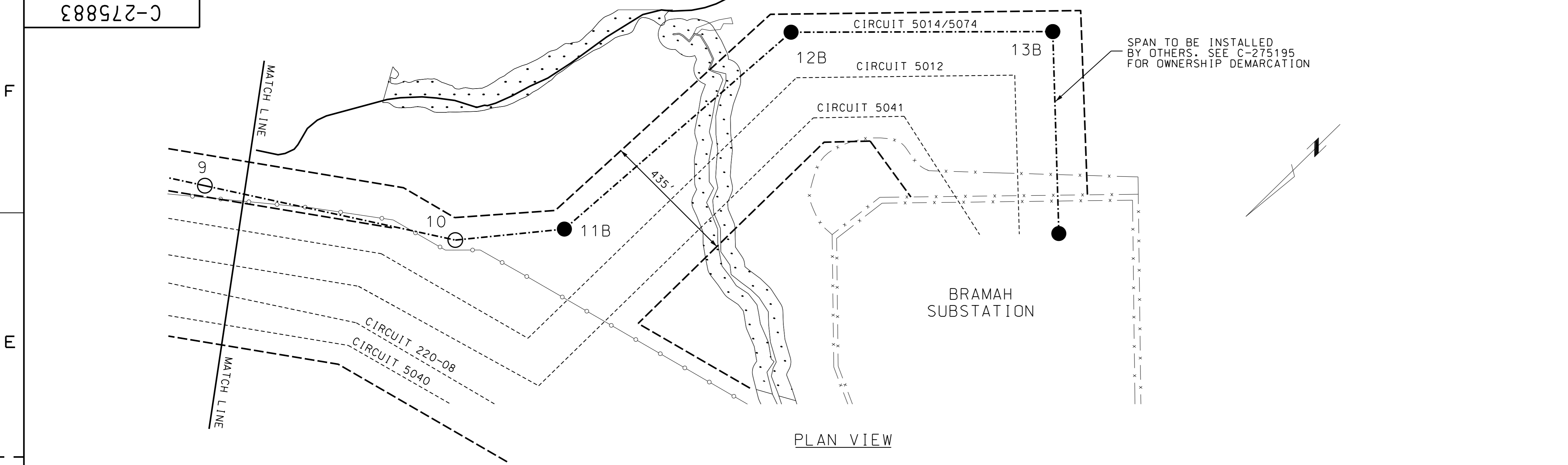
- REFERENCE DRAWINGS:**
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  - DRAWING INDEX C-275884 SH. 11
  - PHASING C-275952
  - OPGW SPLICE MAP C-275878
  - DAMPERS C-275954
  - SPACERS C-275955
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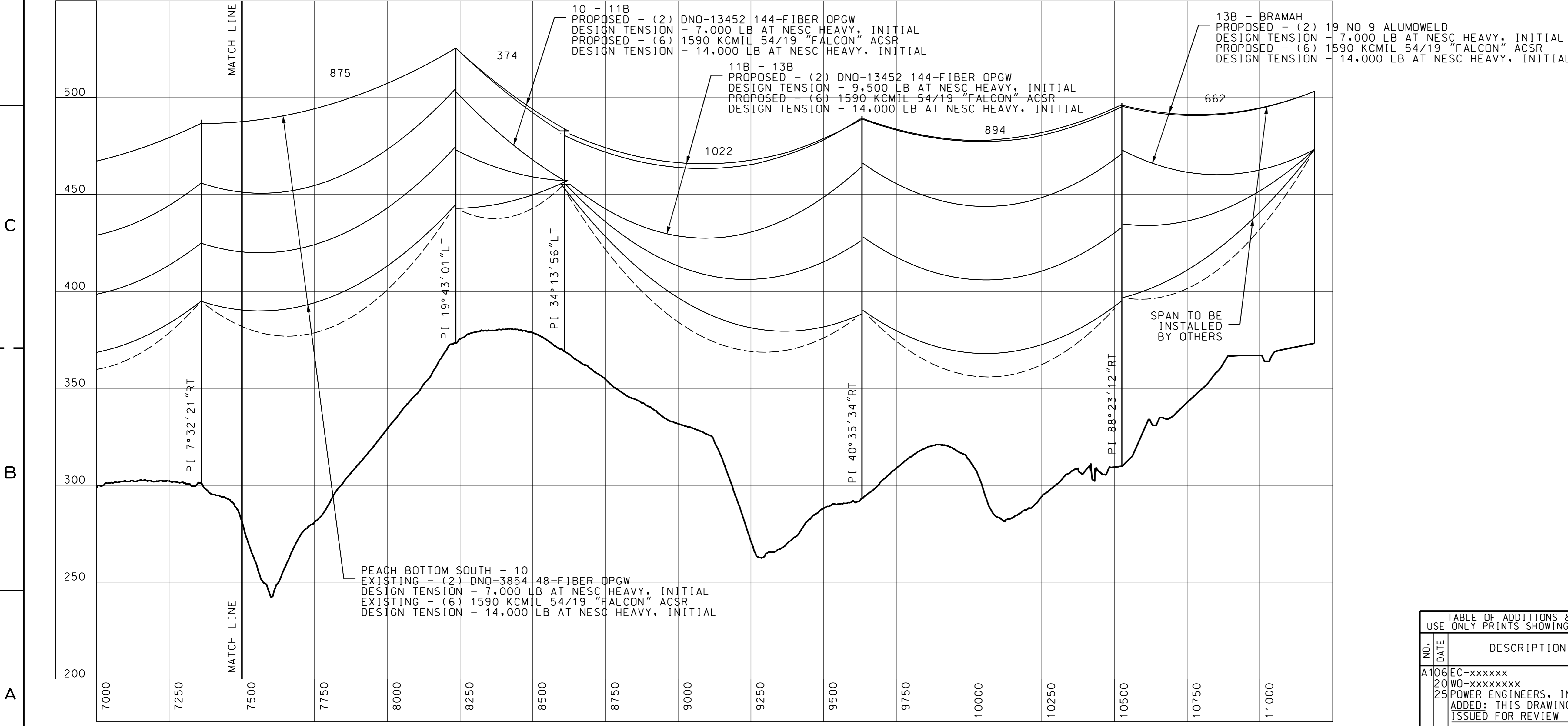
**TABLE OF ADDITIONS & CHANGES**  
USE ONLY PRINTS SHOWING LATEST DATE

NO.	DATE	DESCRIPTION	REV'D	CHK'D	APP'D
A106	06-20-25	EC-xxxxxx WO-xxxxxxx POWER ENGINEERS, INC. ADDED: THIS DRAWING ISSUED FOR REVIEW			

<b>TRANSMISSION</b>		<b>INDEX C-275884</b>	
<b>PLAN AND PROFILE CIRCUIT 5074/5014 500kV TRANSMISSION LINE</b>			
<b>BRANDON SHORES RETIREMENT MITIGATION PECO Energy Company</b>			
SCALE	DESIGN	CADD	CHECKED
NONE	PET	PET	PET
APPROVED		APPROVED	
APPROVED		APPROVED	
APPROVED		APPROVED	
<b>SHEET 2 OF 3</b>		<b>C-275883-A1</b>	



9 STA=73+58.23 EXISTING 500S1ASTNV2 180.5 FT	10 STA=82+35.22 EXISTING 500VS1DEV2 151 FT	11B STA=86+09.53 PROPOSED 3-POLE DE 110 FT/ 85 FT/ 110 FT DRILLED PIER	12B STA=96+31.90 PROPOSED VERTICAL DE 195 FT DRILLED PIER	13B STA=105+25.48 PROPOSED VERTICAL DE 185 FT DRILLED PIER	BRAMAH STA=111+87.89 PROPOSED SUBSTATION 130 FT
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- REFERENCE DRAWINGS:
1. STRUCTURE AND ASSEMBLY INDEX C-276192
  2. DRAWING INDEX C-275884 SH. 11
  3. PHASING C-275952
  4. OPGW SPLICE MAP C-275878
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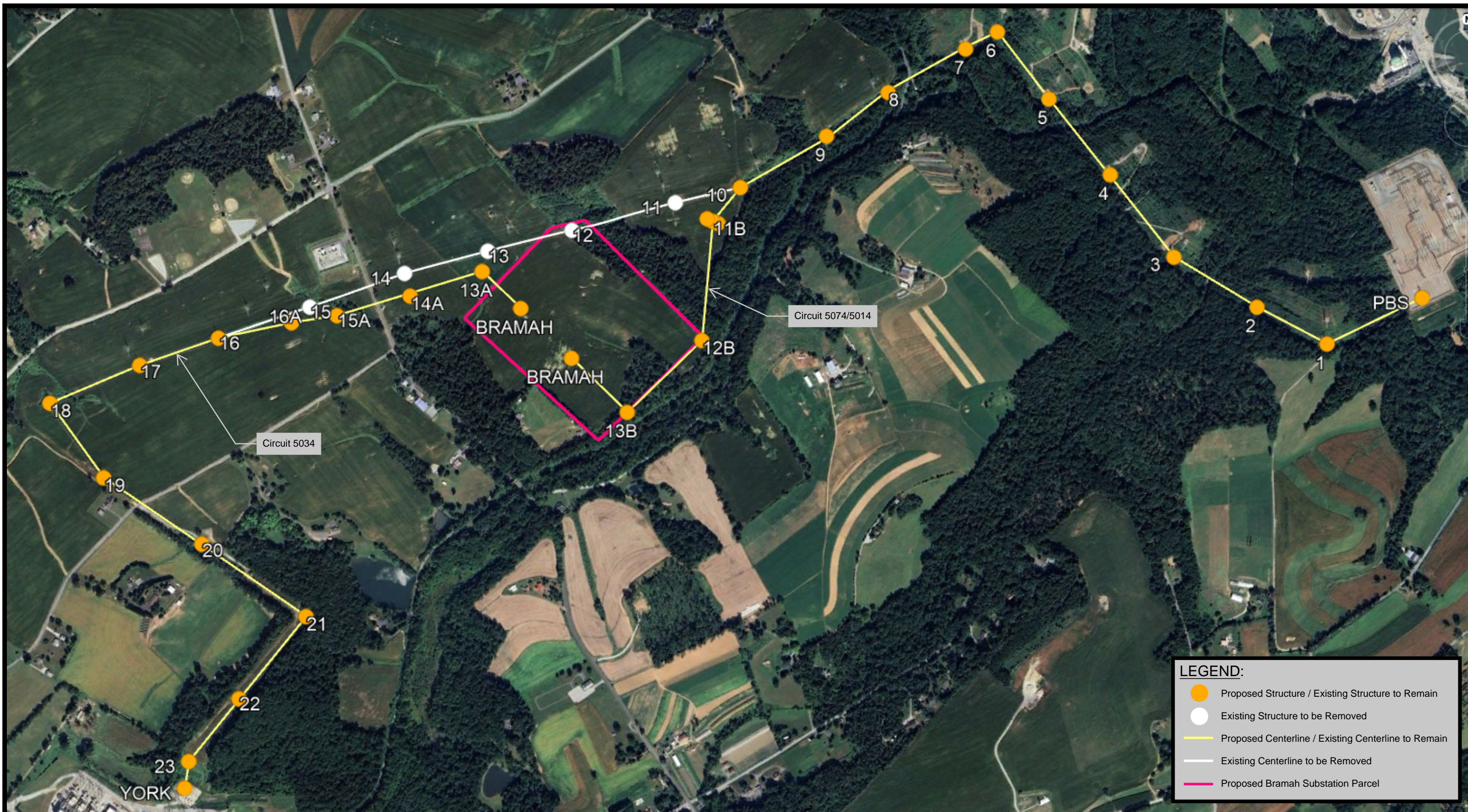
TRANSMISSION		INDEX C-275884	
PLAN AND PROFILE CIRCUIT 5074/5014 500kV TRANSMISSION LINE			
BRANDON SHORES RETIREMENT MITIGATION PECO Energy Company			
SCALE	DESIGN	CADD	CHECKED
NONE	PEI	PEI	PEI
APPROVED	APPROVED	APPROVED	APPROVED
APPROVED	APPROVED	APPROVED	APPROVED
APPROVED	APPROVED	APPROVED	APPROVED
SHEET 3 OF 3		C-275883-A1	

EC-XXXXXX

# **ATTACHMENT 2**

# Circuits 5034 & 5074/5014

Peach Bottom South - Bramah - York  
Project Vicinity Map



# **ATTACHMENT 3**

**Letter of Notification Filing Checklist**  
**PECO 5034 Line**

In an effort to facilitate the Commission's review process for a Letter of Notification (LON) for the Siting and Construction of Electric Transmission Lines, the following checklist may be consulted by the applicant. The applicable regulatory requirements for a LON application are found in 52 Pa. Code §§ 57.71-77. The checklist is provided to streamline the review process by anticipating requests for additional information that may arise from Commission staff. The checklist does not create additional mandates or regulatory requirements for approval of a LON.

**1. Provide the name of the applicant and the address of its principal business office.**

PECO Energy Company  
 2301 Market Street  
 Philadelphia, PA 19103

**2. Name, title and business address of the attorney of the applicant and the person authorized to receive notice and communications with respect to the application if other than the attorney or the applicant.**

Anthony E. Gay  
 PECO Energy Company  
 Vice President & General Counsel  
 2301 Market Street  
 Philadelphia, PA 19103  
 (267) 533-1964  
[anthony.gay@exeloncorp.com](mailto:anthony.gay@exeloncorp.com)

Kenneth M. Kulak  
 Catherine G. Vasudevan  
 Morgan, Lewis & Bockius LLP  
 2222 Market Street  
 Philadelphia, Pennsylvania 19103-2921  
 (215) 963-5384  
[ken.kulak@morganlewis.com](mailto:ken.kulak@morganlewis.com)  
[catherine.vasudevan@morganlewis.com](mailto:catherine.vasudevan@morganlewis.com)

**3. General description of the proposed route of the HV line, to include the number of route miles, the right-of-way width and the location of the proposed HV line within each city, borough, town and township traversed. Describe which sections of 52 Pa. Code §57.72(d)(1)(i)-(vi) the applicant believes are applicable.**

PECO proposes to rebuild and relocate a short section of the existing 5034 Line to allow tie-in to a new 500/230 kV transmission substation that will be constructed by Transource

Pennsylvania LLC (“Bramah Substation”) within Peach Bottom Township, York County, Pennsylvania (hereinafter, the “Project”). PECO’s new 500 kV line construction will occur in two segments and, in total, will be approximately 0.87 miles. The section between York Substation and Bramah Substation will retain the 5034 Line designation. For the new 5034 Line, PECO will reuse 1.21 miles of the existing 5034 circuit, demolish three existing galvanized tubular monopole structures, and construct four new single-circuit weathering steel tubular monopoles for approximately 0.37 miles within a new 140-foot right-of-way to tie into Bramah. The section between Bramah Substation and Peach Bottom South Substation will be temporarily renamed the 5074 Line and later connected to the 5014 Line and renamed the 5014 Line. For the 5074 Line, PECO will reuse 1.37 miles of the existing 5034 circuit, demolish two galvanized tubular monopole structures, and construct one new single-circuit weathering steel tubular three-pole structure and two new single circuit weathering steel tubular monopoles for approximately 0.5 miles within a new 180 feet right-of-way. The new segments will utilize double-bundled 1590 kcmil 54/19 “Falcon” ACSR conductor,<sup>1</sup> and the point of interconnection for each will be the first structure outside the Bramah Substation.

PECO and Calpine Mid Merit, LLC (“Calpine”) have negotiated an asset purchase agreement for the existing 5034 Line.<sup>2</sup> As part of that purchase, PECO intends to acquire certain easements from Calpine on which the existing 5034 Line is sited and those easements will be used for the Project. PECO has filed a separate application with the Commission at Docket No. A-2025-3055493 for approval to acquire these easements from Calpine.<sup>3</sup> The Project will traverse the properties of four landowners, including Calpine, and PECO proposes to construct new transmission structures on property owned by Troyer Farms LLC, Grimmell Farms LP, and Transource Pennsylvania LLC that did not previously have structures. PECO will negotiate to obtain necessary rights-of-way and easements with these impacted landowners.

This application is made pursuant to 52 Pa. Code §57.72(d)(1)(vi): An HV line having a proposed route of two miles or less. The Project meets this criterion because the newly constructed transmission line will be approximately 0.87 miles.

**4. Provide a general statement of the need for the proposed HV line in meeting identified present and future demands for service, of how the proposed HV line will meet that need and of the engineering justification for the proposed line.**

---

<sup>1</sup> Consistent with the statement issued on March 27, 2025, in Docket No. A-2024-3052612, PECO has considered alternative engineering solutions and advanced transmission technologies for the Project. PECO will use ACSR conductors to match the conductors of the existing 5034 Line that PECO will cut into for this Project. In general, the capacity of a transmission line is limited by the lowest-rated conductor on the circuit; therefore, installing advanced conductors on only a portion of a transmission circuit (as here) would not increase the operational capability or reliability of the existing 5034 Line. However, PECO notes that in the event the line is reconstructed in the future, the new transmission structures proposed in this LON will be compatible with advanced conductors.

<sup>2</sup> PECO’s purchase of the line from Calpine has been approved by the Federal Energy Regulatory Commission. *See Calpine Mid Merit LLC and PECO Energy Company*, 192 FERC ¶ 61,043 (2025)

<sup>3</sup> The application remains pending before the Commission and no party has intervened or protested PECO’s application to acquire the associated easements.

The Project activities support transmission projects directed by PJM Interconnection, L.L.C. (“PJM”) (the “Reliability Projects”).<sup>4</sup> The Reliability Projects are necessary to mitigate significant and widespread reliability issues in the Mid-Atlantic region, including PECO’s transmission facilities in southeastern Pennsylvania, that would otherwise result from (a) the planned deactivation of Talen Energy Corporation’s Brandon Shores Generating Station in Maryland, and (b) significant load growth and the retirement of generation facilities in other parts of the PJM footprint.

**5. Please provide an engineering assessment of the project including information to address the following:**

**a) Provide an analysis of minimum conductor clearances and conductor thermal ratings.**

Conductor clearances for the Project are specified in the project design criteria document and exceed the requirements of PECO’s Engineering Practice EPP-2090 OHT Design Clearances. The clearance requirements in EPP-2090 exceed the requirements of NESC 2023. Examples of PECO clearance requirements are provided in subsection b, below.

**b) Provide engineering design criteria and parameters such as vertical clearance to ground.**

**i) 500 kV Vertical Clearances**

Ground, Farmland	33.0’
Roadways, driveways, parking lots	33.0’
Railroads, above top or rail	41.0’
Area not accessible by vehicles	29.0’

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<sup>4</sup> The Reliability Projects include the transmission lines and related facilities associated with PECO’s proposed Brandon Shores Retirement Mitigation Project and PJM 2022 Reliability Window #3 Project. Siting applications for both projects currently pending before the Commission are unopposed and have been assigned to the Commission’s Bureau of Technical Utility Services. *See Application of PECO Energy Co. Filed Pursuant to 52 Pa. Code § 57.71 et seq. for Approval of the Siting and Construction of the Brandon Shores Retirement Mitigation Project Located in Peach Bottom Twp., York Cty., Pa. and Petition for Waiver of 52 Pa. Code § 57.72(C)(10)*, Docket No. A-2024-3051467 (filed September 30, 2024) (“Brandon Shores Application”) & Interim Order Reassigning Application to the Commission’s Bureau of Technical Utility Services (Order entered February 13, 2025); *Application of PECO Energy Co. Filed Pursuant to 52 Pa. Code § 57.71 et seq. for Approval of the Siting and Construction of the PJM 2022 Reliability Window #3 Project Located in Peach Bottom Twp., York Cty., Pa. and Petition for Waiver of 52 Pa. Code § 57.72(C)(10)*, Docket No. A-2024-3051463 (filed September 30, 2024) (“PJM 2022 Window #3 Application”) & Interim Order Reassigning Application to the Commission’s Bureau of Technical Utility Services (Order entered February 13, 2025).

- c) **Provide an explanation as to how the project will be in compliance with the current NESC and, where applicable, information on how the applicant’s design specifications and safety rules may exceed NESC suggested standards for transmission lines.**

PECO has added a margin of safety buffer and a design buffer to the minimum NESC clearance requirements, both of which exceed the minimum NESC requirements. The right-of-way width for the proposed Project is governed by the conductor displacement due to wind with the assumption that buildings can be erected on the easement line regardless of local municipality building setback requirements. The right-of-way width provided exceeds the requirements of NESC and PECO’s Engineering Practice EPP-2090, “OHT Design Clearances” and will provide access for line maintenance, repair, and vegetation management.

6. **If applicable, provide the current height of the structures expected to be replaced, the proposed height of the new structures to be installed and the height of the structures to remain in place. Provide the number of structures proposed vs. current number of structures. Provide the location and footprint of the current structures compared to the proposed structures.**

Reference the below table for new structures heights.

<b>Structure Number</b>	<b>New Structure Height (ft)</b>
11B (5074/5014)	110/85/110
12B (5074/5014)	195
13B (5074/5014)	185
13A (5034)	160
14A (5034)	190
15A (5034)	165
16A (5034)	145

Reference the below table for heights of existing structures that will be removed but not replaced.

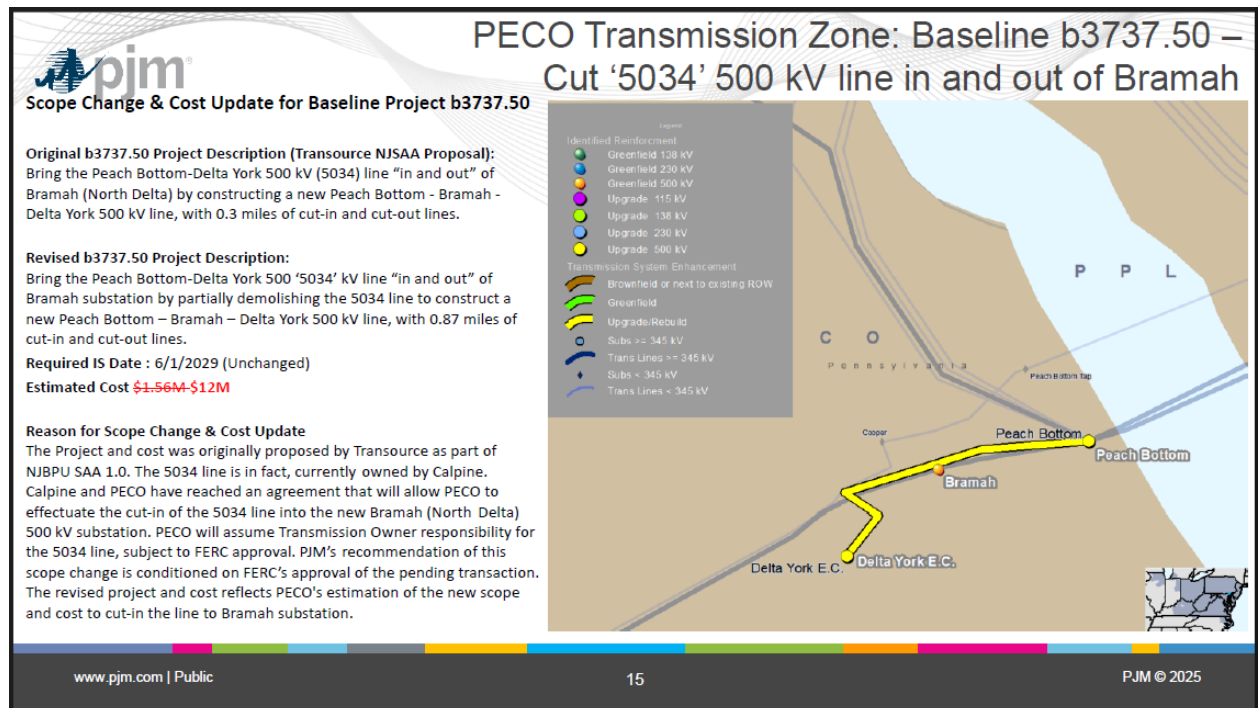
<b>Structure Number</b>	<b>Existing Structure Height (ft)</b>
11	145.5
12	160.5
13	130.5
14	135.5
15	145.5

7. If applicable, state if any properties/easements that did not previously have structures will now have a structure. State if the easement agreement allows for structures on these properties that did not previously have a structure. Explain the Company's process of informing the property owners that a structure will be placed on the easement to their property.

The Project will traverse the properties of four landowners, including Calpine, and PECO proposes to construct new transmission structures on property owned by Troyer Farms LLC, Grimmel Farms LP, and Transource Pennsylvania LLC that did not previously have structures. PECO will negotiate to obtain necessary rights-of-way and easements with these impacted landowners. In the event that PECO is unable to acquire the land rights needed for the Project, PECO will promptly file a separate application seeking Commission approval to exercise the power of eminent domain to acquire necessary land rights for the Project.

8. If applicable, what is the PJM project ID No. for the proposed project? Has this project been submitted to the PJM Transmission Expansion Advisory Committee (TEAC)? If so, please provide a description of the project as submitted to the TEAC. If this project is part of a larger project, summarize the larger project of which the LON is a part. Please describe how this project may mitigate potential planning criteria violations.

The Project's PJM project ID No. is b3737.50. The Project need and solution were most recently presented to the Transmission Expansion Advisory Committee on May 6, 2025, as shown below.



The \$12 million cost projection presented to PJM and described above reflects PECO's estimate at an initial planning level plus or minus 50%. Modifications to a proposed project's cost estimate are typical as a project's design nears completion. In this instance, the proposed Project's cost estimate increased approximately two million dollars. This amount is based on PECO's completion of approximately 90% of the design after the TEAC presentation and before filing this Letter of Notification.

PECO's proposed Project is a PJM Regional Transmission Expansion Plan ("RTEP") Project. PJM prepares an annual RTEP that contains transmission developments needed to ensure reliable transmission service.<sup>5</sup> PJM requests quarterly project updates on RTEP projects, including but not limited to, engineering progress status, cost estimates, construction updates, etc. This process recognizes that cost estimates that are originally provided to PJM are planning-level estimates that may change as the project progresses through design, engineering, and construction. These updates are then publicly posted on PJM's website.<sup>6</sup> PECO will provide PJM the updated total project cost on or about August 1, 2025.

The Project is a critical step in enabling the Reliability Projects. As described in the Brandon Shores Application and PJM 2022 Window #3 Application pending before the Commission for the Reliability Projects, PECO is designated by PJM to construct several new transmission lines to mitigate significant and widespread reliability issues in the Mid-Atlantic region and to foster needed generation additions and retirements as well as load growth on the PJM system, as approved by PJM.<sup>7</sup>

**9. Provide a breakdown of project costs. Please explain who will own, finance and build the proposed project.**

PECO estimates the total Project cost to be \$14 million. Of that cost, \$3.2 million is attributed to materials (new conductor/hardware, optical ground wire, structures, foundations, substation equipment). The remaining costs are attributable to direct labor – primary engineering and design, clearance reviews, and electrical/civil construction – and allocated to PECO overhead and management costs. PECO will own, finance, and build the proposed Project.

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<sup>5</sup> PJM uses the RTEP process to identify system reinforcements that are required to, among other things, meet the North American Electric Reliability Corporation reliability standards, PJM reliability planning criteria, and transmission owner reliability criteria.

<sup>6</sup> See PJM Project Status and Cost Allocation *available at*: <https://www.pjm.com/planning/m/project-construction>.

<sup>7</sup> See Brandon Shores Application, pp. 9-16; PJM 2022 Window #3 Application, pp. 9-16.

**10. If available at the time the LON is filed, please provide a copy of any comments received from state or local officials.**

Not applicable; PECO has not received any comments regarding the proposed Project or this letter of notification.

**11. Please provide the anticipated construction commencement date and the proposed in-service date of the project.**

The Project has a scheduled construction start date of April of 2026 for the Line 5034 demolition and relocation activities to meet an in-service date of December of 2027. The Project requires a transmission outage, currently scheduled for the Fall of 2027.

**12. Provide evidence to show that the size, character, design and configuration of the proposed HV line will not substantially alter its existing right-of-way, if applicable. Please identify all alterations necessary to the existing right-of-way.**

Not applicable. The Project requires PECO to obtain necessary land rights and new right-of-way and does not impact PECO's existing right-of-way. *See* PECO Attachment 1.

**13. A statement identifying the filing date on which the filing of the LON was or is to be made and a statement as found in 57.72(d)(iv) regarding the Commission's review.**

This Letter of Notification is being filed today, July 25, 2025. PECO understands that, pursuant to 52 Pa. Code §§ 57.72(d)(4)(iv) and 57.72(d)(5), the Commission will review and, by order, approve or disapprove this Letter of Notification. If the Commission approves this Letter of Notification, the Project will be constructed as proposed herein without the application process set forth at 52 Pa. Code §§ 57.71 *et seq.*

**14. Provide the number of streams and/or wetlands that will be crossed. Describe how these will be addressed. Will any endangered or threatened species be affected? If a PNDI is required, please provide the results.**

Two streams and one wetland will be crossed by the Project. Vegetation will be removed in the new transmission line crossings of these streams and wetlands to maintain transmission line required clearances. Erosion and sediment control devices and best management practices will be in place to minimize the potential for erosion and sedimentation to these features.

A Pennsylvania Natural Diversity Inventory ("PNDI") was required and identified potentially threatened or endangered species in the vicinity of the Project. Based on a

search of the PNDI database (PNDI-810587, 3/25/2024 and last revised on 3/6/2025), administered by the Pennsylvania Natural Heritage Program, and follow-up consultations with the United States Fish and Wildlife Services (“USFWS”), Pennsylvania Game Commission (“PAGC”), Pennsylvania Fish and Boat Commission (“PAFBC”), and Pennsylvania Department of Conservation and Natural Resources (“PADCNR”), the following federal and/or state rare, threatened, or endangered species are known within the vicinity of the Project:

*Haliaeetus leucocephalus* (Bald Eagle): Two Bald Eagle nests are located within the Project limits. Both of the nests will need to be removed to facilitate the construction of the necessary infrastructure in and around these locations. One of the nests is located in the immediate area of the Calpine transmission line. PECO will be applying to the USFWS for a “Nest Take” permit in the Fall of 2025 in order to remove both nests from the project site. It is anticipated that the nest removals will be undertaken and completed prior to the December 15, 2025 start of the Bald Eagle breeding and nesting season. Apart from requirements associated with a Nest Take permit, PECO anticipates no additional requirements from the USFWS related to the Bald Eagle nest removal activities.

*Plestiodon laticeps* (Broad-headed Skink): PAFBC reviewed habitat assessment surveys completed by PECO’s subconsultants, AECOM Technical Services, Inc. and DuBois and Associates, LLC (collectively, “AECOM/DuBois”) for potential impacts to the Broad-headed Skink in the Project area. Per a PAFBC letter issued on February 27, 2025, PECO has proactively reduced the disturbance areas to the minimum area practicable for the execution of the Project, and no further habitat protection measures are required.

AECOM/DuBois also completed presence/absence surveys for PADCNR for listed threatened and endangered plant species identified through correspondence with PADCNR in 2024 and issued a report of survey findings to PADCNR in January 2025. PADCNR determined that there are no threatened and endangered species in the Project area through their letter issued on January 30, 2025. PAGC reviewed the Project area as part of the PNDI initiation and issued a response of “No Known Impact” and no further consultation was required.

**15. Indicate the number of circuits on the proposed line. Note that if only one is being installed at this time, another LON may be needed when the second circuit is added.**

Both the western (Line 5034) and eastern (Line 5074/5014) Project segments will be single circuit.

**16. Please provide a copy of the certificate of service.**

The certificate of service is attached to the filing.

**17. Provide the specific NERC or other regulatory standard criteria which is driving the proposed project (e.g. TPL-004-1, P.2).**

Not applicable.

**18. Explain why the NERC, or other regulatory standard, violation, is now an issue where it wasn't previously.**

Not applicable.

**19. Explain whether the proposed project meets NERC or PJM minimum planning criteria or whether it exceeds these criteria to meet transmission owner planning criteria. If the project exceeds either of these minimum planning criteria to meet transmission owner criteria, provide a detailed explanation as to why.**

The Project is separate from but related to the Brandon Shores Application and PJM 2022 Reliability Window #3 Application and is necessary to facilitate the construction of the Reliability Projects. The 5034 Project meets PJM minimum planning criteria.

**20. Explain whether load growth in the area has led to any change in circumstances as it relates to the need for the proposed project. If so, quantify these load growth impacts.**

The Project is not driven by load growth in the area. However, as noted above, the Project is a critical step in enabling the Reliability Projects. The Reliability Projects are necessary to mitigate significant and widespread reliability issues in the Mid-Atlantic region, including PECO's transmission facilities in southeastern Pennsylvania, that would otherwise result from (a) the planned deactivation of Talen Energy Corporation's Brandon Shores Generating Station in Maryland and (b) significant load growth and the retirement of generation facilities in other parts of the PJM footprint.

**21. State the age and anticipated service life and describe the overall health of the transmission line facilities to be replaced. Additionally, include information related to conditions which may have accelerated aging or led to premature failure of the facilities (e.g. corrosive environment).**

Not applicable. Transmission structures of the existing 5034 Line that will be demolished will not be replaced as part of the Project. Instead, new transmission structures will be constructed in new locations to bifurcate the existing 5034 Line into two segments and tie-in to the new Bramah Substation.

- 22. Provide information regarding any unplanned outages on the subject transmission facilities over the previous 5 years (or more), including the duration, cause, whether service to customers was interrupted by outages on the subject transmission line(s), and if so, the number and type of customers which were impacted. Additionally, explain whether the proposed project would mitigate the effects of these outages.**

The 5034 Line had one unplanned outage in the last five years. On 5/16/2022, the 5034 Line Peach Bottom/Delta tripped. An equipment failure at the Peach Bottom substation resulted in the fault. The protection relays operated as designed. No customers were impacted.

- 23. Explain whether alternative solutions were considered. If so, provide a brief description of the alternative(s) and provide a detailed explanation of why the chosen solution was selected.**

PECO considered potential routes for the proposed transmission line with minor deviations from the proposed route. However, because the Company will re-use most of the existing 5034 Line no other route was evaluated. The selected approach minimized the construction scope, construction disturbances and new right-of-way requirements. The Project was selected because it is efficient, cost-effective, and low-impact in regard to the surrounding community.

- 24. Explain whether any of the loads served by the transmission facilities to be replaced are considered to be critical customers.**

Not applicable.

- 25. Quantify the anticipated increase in reliability in terms of customer average interruption duration index, system average interruption duration index, and system average interruption frequency index.**

Not applicable. The Project is critical to the Reliability Projects which are designed to mitigate significant and widespread reliability issues in the Mid-Atlantic region, including PECO's transmission facilities in southeastern Pennsylvania, that would otherwise result from (a) the planned deactivation of Talen Energy Corporation's Brandon Shores Generating Station in Maryland and (b) significant load growth and the retirement of generation facilities in other parts of the PJM footprint.

- 26. If a transmission owner customer requested the proposed project and is not paying the entire cost, explain why the costs will be assumed by other transmission owner customers.**

Not applicable. A PECO transmission owner customer did not request the proposed Project.

**27. Provide a detailed description of the methodology used to determine that the subject transmission facilities have reached the end of their useful service life. Additionally, provide any survival curves or utility specific data used in this determination.**

Not applicable.

Revised October 2018